

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

JAVIER PENA ROBLES

DEBTOR(S)

BANCO POPULAR DE PR
Movant

VS.
JAVIER PENA ROBLES
ALEJANDRO OLIVERAS RIVERA,
TRUSTEE

CASE NO 09-03999-MCF

CHAPTER 13

**DEBTOR'S RESPONSE TO MOTION REQUESTING RELIEF
FROM THE AUTOMATIC STAY**

TO THE HONORABLE COURT:

COMES NOW debtor in the above captioned case, through the undersigned attorney, and respectfully states and prays as follows:

1. Banco Popular de PR filed a motion requesting relief from the automatic stay basically stating that debtor has four (4) post-petition payments in arrears in their post-petition direct mortgage loan payments.

2. Debtor hereby respectfully submits that he is in the process of obtaining the funds to cure the arrears in direct post-petition payments to Banco Popular de PR on or before the preliminary hearing scheduled for November 2, 2011.

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Debtor's Response to Motion Requesting Relief to the Automatic Stay
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WHEREFORE, debtor respectfully requests from this Honorable Court that upon payment of the post- petition arrears, deny the motion for relief from stay filed by Banco Popular de PR.

I CERTIFY that on this same date a copy of this notice was sent by the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; Banco Popular de PR c/o Carlos G. Batista Jimenez, Esq; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor, Javier Pena Robles Borinquen Valley 118 Molinillo Street Caguas PR 00725.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 17th day of October, 2011.

/s/ Roberto Figueroa Carrasquillo
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